# Orlando, Anne Page 1 of 2

----- Forwarded by Susan K Kozacek/R3/USDAFS on 10/16/2003 05:34 PM ----- eletimbuktu@yahoo.com 10/12/2003 12:39 PM

To: skozacek@fs.fed.us

CC

Subject: Environmental Impact Statement for Tucson Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek Coronado National Forest Federal Building, 300 West Congress Tucson, AZ 85701

Dear Ms. Kozacek.

Please withdraw the current draft Environmental Impact Statement for Tucson Electric Power's proposed 345 kilovolt powerline.

The proposed "Western" and "Crossover" routes would destroy the scenery and integrity of some of the most beautiful and wild places left in Arizona. The landscapes of the Tumacacori Highlands are a treasure, and undisturbed areas like these are very rare these days. This is one of the few places where a person can enjoy nature unmarred by our onslaught of human development, use, and land conversion. The area is rich in rare watchable wildlife

Excellent electrical service to Nogales and Santa Cruz
County can be achieved by building the small transmission
line. What the TEP has proposed is a massive,
environmentally destructive, and extremely controversial
powerline to export power to Mexico.

## Comment No. 1

Sections 3.2 and 4.2 present analyses of the existing visual resources, and potential impacts to these visual resources for each alternative, including changes in Scenic Integrity.

Sections 3.1.2 and 4.1.2 present analyses of existing recreational settings and activities, and potential impacts to recreation from the proposed project. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

#### Comment No. 2

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

# Orlando, Anne Page 2 of 2

This project should not be allowed to mar a gorgeous cont. unmarred land, because few refuges like this still exist.

Feasible alternatives exist which cost less money and would not destroy the integrity of this region, but the draft EIS doesn't adequately address these. The draft EIS should be withdrawn as does not present an honest picture of how needs can be met easily without this destructive project.

I urge DOE to issue a new draft EIS which fully explores all available options including a local power plant and smaller power lines which would not be designed to serve Mexico.

Thank you for reviewing this important issue.

Sincerely,

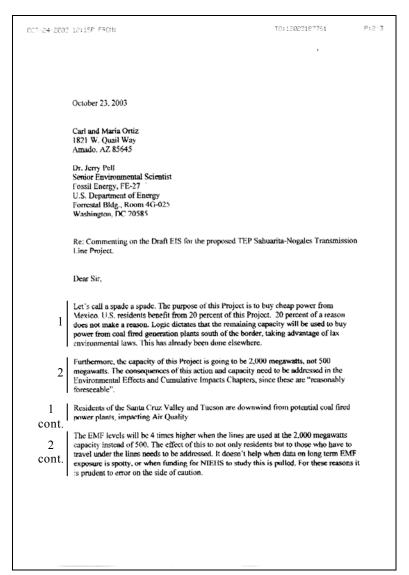
ANNE ORLANDO 2855 BIDWELL PL. #2 DAVIS, California 95616

## Comment No. 3

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

## Ortiz, Maria and Carl Page 1 of 2



#### Comment No. 1

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...."

The Federal agencies do not have any information suggesting that any power plant construction in Mexico is reliant upon or otherwise connected to TEP's proposed project. Therefore, the potential for construction of power plants in Mexico is not a connected action and is not analyzed in Chapter 4, Environmental Effects, of the EIS. Refer to the response to Sky Island Alliance, Comment 14, for further discussion of power plant construction in Mexico.

Chapter 5, Cumulative Effects, of the Final EIS has been augmented to discuss the growth of electricity demand in Mexico and the United States and the potential for new power plants, and to describe qualitatively the potential impacts in the United States (including air quality impacts) from power plant construction in southern Arizona and Sonora, Mexico. Chapter 5 has also been revised to describe the regulation of power plants in Mexico (including coordination between the United States and Mexico), potential fuel sources, and associated emissions.

## Comment No. 2

The maximum level at which the proposed 345-kV transmission line would be operated is 500 MW (refer to the response to Border Power Plant Working Group, Comment 2). If TEP wanted to operate the proposed 345-kV transmission line above 500 MW, TEP would have to apply to DOE for an amendment to their Presidential Permit, and DOE would have to perform additional analysis required by NEPA. The maximum EMF levels listed in Table 4.10-2 were calculated correctly based on operation of the proposed 345-kV transmission line at the 500-MW level.

# Ortiz, Maria and Carl Page 2 of 2

001-24-200	3 12:15P FRCM:	TO:12023187761	P:3/3
3	We don't believe we should have to pay with our health or the just for the enrichment of one company. We also feel that mor will make for better homeland security. Therefore, we recommand the security of th	e local generation and grids	
	Respectfully.		
	Maria Ortiz		
ĺ			

# Comment No. 3

As discussed in Section 2.1.5, a new power plant in Nogales is not a viable alternative to a new, second transmission line. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS.

# Paige, Richard Page 1 of 1

1109 W. Placita Refinada Green Valley, AZ 85614 September 15, 2003

Mr. John M. McGee, Forest Supervisor U.S. Forest Service 300 West congress, Tucson AZ 85701

Re: Proposed TEP Sahuarita-Nogales Transmission Line

Dear Sir

I chose to live in Green Valley, because of the many nearby mountain ranges, the socalled "Sky Islands". I am a former Hike Master for the Green Valley Hiking Club and I also lead hikes for Pima Community College, I spend three to four days a week hiking all over Southern Arizona. I know the Tumacacori and Atascosa mountains well. This area has been proposed for Wilderness status, which it deserves.

The current powerline proposal calls for 191 power poles of 140 feet height and 14 lines to pass through these two mountain ranges. This would be a major intrusion into this rugged, beautiful and nearly roadless and undisturbed area. It is unthinkable to consider the placement of these structures along Ruby Road, near Sycamore Canyon, and at the base of Atascosa Peak and the officially designated historic fire lookout.

A case has been made for the need of a back up line for Nogales and Santa Cruz County. Only 20% of this line's capacity (100 Megawatts out of 500) is for Nogales. The remainder is for proposed export and sale to Mexico. This does not justify this destructive intrusion into the Coronado National Forest and I respectfully request that the United States Forest Service deny a permit for the passage of this transmission line.

Sincerely

Richard Paige

## Comment No. 1

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project. Section 4.4.1.1 (Archaeological and Historical Sites, Western Corridor) specifically addresses impacts to the Atascosa lookout tower.

#### Comment No. 2

TEP reached an agreement with Citizens to provide up to 100 MW of transmission capacity from Tucson to Nogales, Arizona, and TEP anticipates using the remaining 400 MW of capability for transport of energy between the United States and Mexico (see Section 1.5, TEP's Proposed Project Capacity and Usage, of the Final EIS).

Chapter 3 describes the affected environment of the area and Chapter 4 evaluates the potential impacts of the proposed project, including potential impacts on the Tumacacori EMA of the Coronado National Forest.

# Pelech, Ronald A. Page 1 of 1

Ronald A. Pelech 311 N. McNab Drive Apt 8 Nogales, AZ 85621 October 3, 2003

Sue Kozacek Acting Forest Supervisor Coronado National Forest 300 W. Congress Tucson, AZ 85701 Received
0CT 06 2003
Coronado National Fount
Tucson, AZ 85701

Dear Ms. Kozacek,

I am writing to you about the Tucson Electric Power Sahuarita-Nogales Transmission line DEIS and needed Forest Plan Amendments.

I strongly urge you not to amend your Land and Resource Management Plan to allow Tucson Electric Power to build a massive 140 foot tall tower through the Tumacacori, Atascosa and Pajarito Mountains.

I like to go hiking in these rugged wild areas when I can find the time off from work. The area offers solitude, exceptional scenic beauty and wildlife habitat that would be adversely affected by a power line and the twenty miles of new roads that would be built. The area has a unique mix of plants, birds and animals, even including a jaguar last year. The 200 acres of Coronado National Forest that would be destroyed by this project are too close to the existing Pajarita Wilderness Area, the Gooding Research Natural Area and the renowned birding area of Sycamore Canyon.

This project is not really needed to meet the alleged goal of ensuring that Santa Cruz County experiences no more of the power blackouts that occurred in 1999. A better, cheaper solution would be to put a small 115 kV powerline down existing utility corridors. Such a smaller powerline would be better for local needs and would likely meet less local resistance because of less impact on property and environmental values in Santa Cruz County. On September 26, 2003 the <u>Arizona Daily Star</u> reported the results of a public hearing in Green Valley. The report states that all seventeen speakers opposed the powerline and cited this as a rare situation when ranchers and environmentalists all agreed in opposing this project. Furthermore, the Santa Cruz County supervisors only want a smaller 115 kV line, and the mayor of Nogales and the Nogales City Council are actively fighting the project.

Once roads are established to build this project, they will be permanent scars and avenues of approach for lawbreakers to enter sensitive lands. Smugglers of drugs, illegal aliens and who knows what will use these roads and have an adverse impact on our nation's security. So please deny any special use permits for the Western and Crossover Routes of TEP's powerline project because of their negative impacts on a special area, on Santa Cruz county and on our nation.

Sincerely, Consult A Delical Ronald A. Pelech

## Comment No. 1

The Federal agencies note the commentor's opinion that USFS should not to amend their Land and Resource Management Plan to allow the proposed project.

## Comment No. 2

The Western Corridor would require construction of approximately 20 mi (32 km) of temporary new roads for construction on the Coronado National Forest, and the Central and Crossover Corridors would require fewer roads. Unnecessary project roads would be closed following construction (see Section 4.12, Transportation). The area of disturbance on the Coronado National Forest would vary for each corridor (see Table 4.12-1, Temporary and Permanent Area Disturbed on the Coronado National Forest by the Proposed Project).

Sections 3.1.2 and 4.1.2 present analyses of existing recreational settings and activities, and potential impacts to recreation from the proposed project. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Sections 3.2 and 4.2 present analyses of the existing visual resources, and potential impacts to these visual resources for each alternative.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including vegetation and wildlife (see Section 4.3.2).

## Comment No. 3

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

## Comment No. 4

Section 4.3.2 states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances.

The Federal agencies have revised Sections 4.1.1, Land Use; Section 4.12, Transportation; and Chapter 5, Cumulative Impacts of the Final EIS based on the U.S. Border Patrol's response (USBP 2004) to the Federal agencies' request regarding illegal immigration and law enforcement activities in the proposed project vicinity. The U.S. Border Patrol's response generally reenforced the information on which the relevant analysis in the Draft EIS was based. The U.S. Border Patrol stated that the roads associated with the construction and maintenance of the proposed project would contribute to an increase in illegal immigrant and narcotic smugglers in the area and affect U.S. Border Patrol operations. The effects of these activities are reflected in the Final EIS in the sections listed above

#### Comment No. 5

The Federal agencies note the commentor's requests that any special use permits for the Western and Crossover Corridors be denied.

# Pelech, Walter and Dorothy Page 1 of 1

5122 East Citrus Street Jueson, arizona 85712 October 5, 2003 Supervisor Sue Kozacek Coronado National Forest 300 West Congress Tucson, Arizona 85701 Dear Sufervisor Hozacek:

Our comments concern the Jucson
letric Power Sahuarita-Nogales Transmission
line DEIS and needed Forest Plan Amendments,

We urpe that you deny any
special use permits for the Western and Crassover
Routes. A smaller 115 KV powerline should be
Routes. A smaller 115 KV powerline should be
the preferred line and it should be built
along existing utility corridors.

There is no need to ruin a lovely
natural area like the Jumacacori and
Otarrara Mountains. We have spent much natural area like the Sumacacore arms
Atarrara Mountains. We have spent much
time in these areas, birding and hiking,
and we know this area is no place for
a powerline. Sincerely,
Walter & Dorothy Pelech

#### Comment No. 1

The Federal agencies note the commentor's opposition to the Western and Crossover Corridors.

#### Comment No. 2

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

#### Comment No. 3

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities, including hiking and birding, and analyze the potential impacts to these resources from the proposed project.

Sections 3.3 and 4.3 present description of the existing biological resources and analyze the potential impacts to these resources.

# Pelech, Walter, Dorothy, and Ronald A. Page 1 of 1

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Walter and Dorothy Pelech Ronald A. Pelech 5122 E. Citrus St. 311 N. McNab Dr. #8 Tucson, AZ 85712 Nogalos, AZ 85621

October 5, 2003

Dr. Jerry Pell Office of Fossil Energy U.S. Department of Energy Washington, D.C. 20585

Dear Sir:

We are writing to you about the Tucson Electric Power Sahuarita-Nogales Transmission line DEIS. We have often gone camping, hiking and birding in this wild, rugged area that offers solitude, exception al scenic beauty and irrplaceable wildlife habitat that would be adversely affected by 191 massive 140 foot tall towers and over twenty miles of new roads. The area has a unique mix of plants, birds and animals, even including a jaguar that was photographed last year. The area of the Coronado National Forest that would be affected is too close to the existing Pajarita Wilderness Area, the Gooding Research Natural Area and the renowned birding area of Sycamoro Canyon, which would detract from these existing natural areas.

The Western and Crossover routes chosen for this project are the longest and most expensive of all possible routes. A project of this magnitude and cost is not necessary to meet the power needs of Nogales and Santa Cruz County. A better, cheaper solution would be to put aless costly 115 kV powerline along existing utility corridors. The Santa Cruz County supervisors only asked for a 115 kV powerline, and the mayor of Nogales and the Nogales city council are actively fighting the major of nogales and the nogales city council are actively fighting this project in its present form. On September 26, 2003 Tucson's Arizona Daily Star reported the results of a public hearing on the project in Green Valley. The report states that all seventeen speakers opposed the powerling and cited this as a relatively rare instance when ranchers and environmentalists all agreed on a subject (i.e. opposing this project). Once roads are built for this project, they will be permanent avenues of approach for law breakers to enter sensitive wild lands. Smugglers of drugs, illegal aliens and who knows what will use these roads and have an adverse immant on our nation's security.

We do not support this proposed project because of its adverse environmental impact on irreplaceable wildlands and wildlife habitat. we also do not support the project because the economic cost is not justified when a smaller 115 kV powerline along existing routes will meet the needs of Santa Cruz County. So please consider withdrawing this Draft Environmental Impact Statement and replacing it with one that includes a smaller powerline in existing corridors or a local power plant which would better suit the County's need for power.

Walter Pelech Dorothy Pelech Ronald A. Pelech Ronald A. Pelech

#### Comment No. 1

Refer to the response to Comment 2 in the previous submittal from Ronald A. Pelech.

Section 3.1, Land Use, discusses the affected environment of the Pajarita Wilderness, which encompasses the Goodding Research Natural Area and part of Sycamore Canyon. The structure locations, construction areas, and proposed access roads for all three corridors would not enter into the Pajarita Wilderness. Potential impacts to these resources are addressed in the resource sections of Chapter 4, Environmental Effects.

## Comment No. 2

Refer to the response to Comment 3 in the previous submittal from Ronald A. Pelech.

#### Comment No. 3

Refer to the response to Comment 4 in the previous submittal from Ronald A. Pelech.

#### Comment No. 4

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

## Perifou, Marie Clark Page 1 of 2

Tueson, October the 10th Mister J Pell I am souding this letter is regard to I want to express my opposition to this enterprise for the following reasons: - Its route is the longer, most expensive and emison mentally destruction of all the alternative possible.

- It crosses a proposed Wilderness area - It's need is dubious. - A smaller, len detensive power line would not be as domasing physically a cethalically to the environment.

The energy homenitted on this line would not bought Souto Cruz Corenty.

#### Comment No. 1

The Federal agencies note the commentor's opposition to the proposed project.

#### Comment No. 2

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

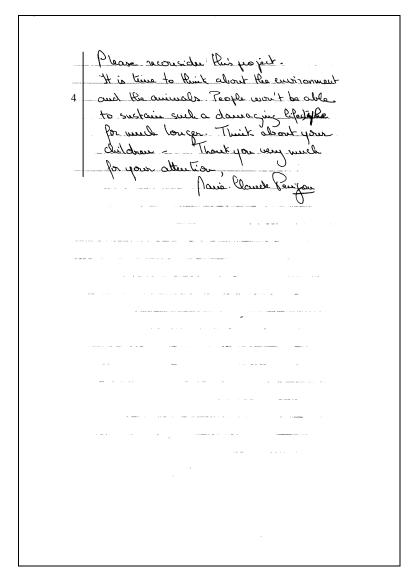
#### Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

TEP reached agreement with Citizens to provide up to 100 MW of transmission capacity from Tucson to Nogales, Arizona (part of Santa Cruz County), and TEP anticipates using the remaining 400 MW of capability for transport of energy between the United States and Mexico (see Section 1.5, TEP's Proposed Project Capacity and Usage, of the Final EIS).

# Perifou, Marie Clark Page 2 of 2



# Comment No. 4

Direct and indirect effects of the proposed project, including impacts to wildlife (see Section 4.3.2), are evaluated in Chapter 4, Environmental Effects, for each resource area. Cumulative effects of the proposed project combined with other reasonably foreseeable past, present, and future actions are evaluated in Chapter 5.

## Poppino, Marilyn Page 1 of 1

211 E. Rudasill Rd. Tucson, AZ 85704 September 30, 2003

Dr. Jerry Pell, Office of Fossil Energy **US Department of Energy** Washington D.C 20585

I am writing on behalf of many Arizona residents who object to the power line applied for by TEP crossing the heart of the Tumacacori Highlands. It's one more road we do not need and will slice through the beautiful highlands. The 140 foot tall powerline is not going to benefit Santa Cruz county and would scar the landscape

Why is a 345kV line needed anyhow? A smaller less obtrusive 115kV is cheaper and can more easily be run along existing utility corridors and buried near homes.

This is an unnecessary economic, environmental and cultural burden on southern Arizona. The Draft Environmental Impact Statement needs to be withdrawn and a new assessment put in place that analyzes the solutions to power needs in Santa Cruz County more accurately.

cont.

The Tucson Electric Power proposal admits it will have an adverse aesthetic impact. The impact of a road and power lines is uncertain at best.

Please consider another alternative.

DR. MARILYN POPPINO 211 E. RUDASILL RD. TUCSON, AZ 85704

#### Comment No. 1

Chapters 3 and 4 provide analyses on the affected environment and potential impacts to the environment from the proposed project and associated roads, including evaluation of visual resources (Sections 3.2 and 4.2) and other resources in the Tumacacori Highlands.

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

#### Comment No. 2

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A smaller transmission line in lieu of the proposed 345-kV line (e.g., 115-kV line) would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

# Poppino, Marilyn Page 1 of 1

211 E Rudasill Rd. Tucson, AZ 85704 September 30, 2003

Sue Kozacek Acting Forest Supervisor Coronado National Forest 300 W. Congress Tucson, AZ 85701

Dear Ms. Kozacek

My comments are in reference to the "Tucson Electric Power Sahuarita-Nogles Transmission line DIES and Forest Plan Amendments"

I would like to object to the construction of the powerline in the Western or Crossover Routes. TEP proposes to build over 20 new miles of road for the Preferred Route. Road density in the Tumacacori EMA is already above acceptable limits.

More would violate the Forest Plan.

3 Many sensitive forest plants and wildlife species would be impacted, and the beauty of this spectacular landscape would be lost forever.

1 I would urge you to deny and special use permits of the Western and Crossover cont.

Many thanks:

Marilyroppe

DR. MARILYN POPPINO 211 E. RUDASILL RD. TUCSON, AZ 85704

## Comment No. 1

The Federal agencies note the commentor's opposition to the Western and Crossover Corridors and urges the denial of any special use permits for the Western and Crossover Corridors.

#### Comment No. 2

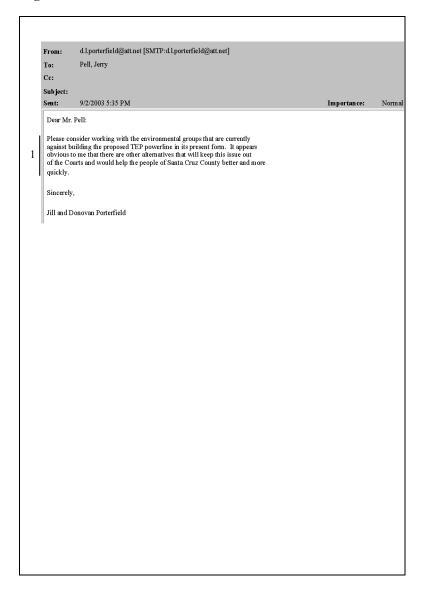
The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. TEP would close 1.0 mi (1.6 km) of existing road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project, such that road density on the Coronado National Forest would not be affected.

#### Comment No. 3

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

# Porterfield, Jill and Donovan Page 1 of 1



# Comment No. 1

A number of environmental groups have been involved in the NEPA process for the proposed project, through the opportunities for public participation (see Section 1.6). The Federal agencies have considered the information and preferences expressed by all members of the public, including environmental groups, in preparation of this Final EIS.

# Purdon, Kathryn Page 1 of 1

Sue Kozacek Acting Forest Supervisor Coronado National Forest 300 W. Congress Tucson, Az. 85701

#### Dear Ms. Kozacek,

Please use your influence to STOP the proposed Tucson Electric Power Sahuarita-Nogales Transmission line DEIS. The environmental impact of this mega power system is huge and totally unnecessary. The needs of Santa Cruz County for alternate power source can be solved so much more simply and economically, both financially and environmentally. The only need for huge new power lines is to line the pocket of TEP at the expense of the taxpayers and the environment. Making use of existing right-of-ways or building a power plant in Nogales are much better solutions to this rather minor problem. Please don't allow TEP to destroy our beloved wilderness areas. Thank you.

Yours truly,

Kathryn Purdon Green Valley, Arizona kmpurdon@cox.net

## Comment No. 1

The Federal agencies note the commentor's preference for the No Action Alternative.

#### Comment No. 2

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A portion of each of the action alternatives follows or crosses an existing natural gas pipeline (see Table 2.3-1, Summary Comparison of Potential Environmental Effects of Alternatives) that is within a utility corridor and has some access roads and other associated ground disturbance. Building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5 of the Final EIS).

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

## Pybus, Brooke Page 1 of 1

Department of Energy Dr. Jerry Pell, Office of Fossil Energy, U.S. Department of Energy, Washington, D.C. 20585

Comments opposed to "Tucson Electric Power Sahuarita-Nogales Transmission lines- DIES"

Dear Dr. Pell:

I am an Arizona resident and aware of the great vistas this state has to offer. There are fewer and fewer of these vistas left in the West. This proposal is just another slight againest those remaining wild areas. All of us enjoy visiting these areas, but, few-of us seem to be able to keep them from being "developed" by people with other intentions. The preferred Western Routes and Crossover routes are the longest, most expensive, and most environmentally damaging, of all the alternatives considered. This route, if approved, would slice through a citizen proposed Wilderness Area and forever scar this still, relatively, untouched wild location.

This proposal for a 345KV line is "above and beyond" the requested need of Santa Cruz County, for power. Further, most of this additional power is targeted for sale in Mexico. Why didn't they offer a smaller power line to fulfill Santa Cruz County's power need? Long term power needs for Santa Cruz County could easily be met with a smaller, 115KV line, installed along existing utility corridors at a fraction of the cost.

I do not support these proposed routes because it does not serve the interests of Santa Cruz County 's needs as originally intended under ACC order 62011. This proposal is an unneccessary burden both economically and environmentally, to the residents of Arizona. If the increasing challenge of illegal immigrantion and the refuse they leave behind, aren't enough, now the Arizona Sector Utilities want to further degrade the fragile beauty of the Borderland areas.

Please consider withdrawing this Draft Environmental Impact Statement and issuing a new assessment that properly analyzes real solutions to power needs in Santa Cruz County and includes a smaller line using existing easements and / or local power plant.

Respectfully,

Brooke Pybus 8002 N. 14th Ave Phoenix, AZ 85021

رياور

## Comment No. 1

Direct and indirect effects of the proposed project, including impacts to visual resources (see Section 4.2), are evaluated in Chapter 4, Environmental Effects, for each resource area. Cumulative effects of the proposed project combined with other reasonably foreseeable past, present, and future actions are evaluated in Chapter 5.

#### Comment No. 2

The affected environment of the Western and Crossover Corridors is described in Chapter 3, and the potential environmental impacts (including socioeconomic impacts) from these alternatives are fully evaluated in Chapter 4.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

#### Comment No. 3

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's

## Comment No. 3 (continued)

proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

#### Comment No. 4

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

The Federal agencies have revised Sections 4.1.1, Land Use; Section 4.12, Transportation; and Chapter 5, Cumulative Impacts of the Final EIS based on the U.S. Border Patrol's response (USBP 2004) to the Federal agencies' request regarding illegal immigration and law enforcement activities in the proposed project vicinity.

The U.S. Border Patrol's response generally re-enforced the information on which the relevant analysis in the Draft EIS was based. The U.S. Border Patrol stated that the roads associated with the construction and maintenance of the proposed project would contribute to an increase in illegal immigrant and narcotic smugglers in the area and affect U.S. Border Patrol operations. The effects of these activities are reflected in the Final EIS in the sections listed above. Refer also to the response to Sky Island Alliance, Comment 14.

#### Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the

## Comment No. 5 (continued)

proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)